

Calderon, Wanda

From: Carey Guilbeau <CGuilbeau@HovensaERT.com>
Sent: Friday, November 04, 2016 6:44 PM
To: Stein, Carol; Chester, Amy; Sawyer, William; Vaughn, Stephanie
Cc: Roberto Puga; Mary Koks - Munsch; Mills, Flaire
Subject: Proposed Changes to the St. Croix Alumina Administrative Order on Consent (RCRA Docket # 02-2001-7301)

Good evening,

As requested during the September 12 conference call, here is a summary of the volumes of recovered groundwater from the St. Croix Alumina and the HOVENSA sites and demonstration on how those volumes would be used to fairly allocate the cost of wastewater treatment to each site.

For example only, the table below allocates the costs based on the amount of recovered fluids as reported to EPA, by each Party, in 2015:

Facility	2015 Recovered Fluid Estimates (Bbls)				Monthly WWT Fee
	Recovered GW	Recovered PSH	Combined (GW & PSH)	%	
SCA	76,000	65	76,065	4.3%	\$ 7,486.86
HOVENSA	1,700,000	1,900	1,701,900	95.7%	\$ 167,513.14
Totals			1,777,965	100.0%	\$ 175,000.00

If the Administrative Order is amended, the ERT would be able to invoice the St. Croix Alumina group for their portion of wastewater treatment services beginning on February 17, 2016 (i.e. the effective date of the ERT), and, based on the 2015 recovery rates, the ERT would recoup approximately \$70,000 for 2016 services and approximately \$90,000 for 2017 services.

The ERT appreciates EPA's agreement, as expressed during the September 12 conference call, to evaluate the Administrative Order and pursue changes that are aligned with the outcome of HOVENSA's bankruptcy process. Please let me know if you have any questions or if I can provide additional information.

Regards,

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